

Your
Seattle
City Light

Joseph P. Recchi, Superintendent
Charles Royer, Mayor

June 16, 1982

Document Control Officer
Office of Toxic Substances
Environmental Protection Agency, Room E-401
401 M Street, SW., Washington, D. C. 20460

Dear Sir:

This letter is in response to Federal Register Volume 47, No. 78, dated April 22, 1982, the proposed new rules for the use of polychlorinated biphenyl (PCB) in electrical equipment. Seattle City Light has PCB insulated capacitors installed in the distribution system and in the major substations. We will replace the PCB capacitors in the distribution system within the proposed 10 year limit, recognizing the possible environmental hazard. However, we feel that the PCB capacitors installed at our major substations could be replaced safely with an additional four years to that schedule. Our present schedule calls for the replacement of all PCB capacitors by 1996.

The substations are a secure area, and the exposure of the PCB capacitors to the general public is minimal. The older capacitors are being removed first, and the newer PCB capacitors have been scheduled to be replaced by 1996. The last capacitors to be replaced will be 24 years old at that time, and the life expectancy of this type of equipment is 30 years. All the capacitors in the substation and distribution systems are inspected regularly and the procedures for cleaning up PCB spills have been established in accordance with EPA regulations. Inspections and clean-up procedures will be maintained until all PCB capacitors have been removed from the system.

To accelerate the replacement program of the PCB capacitors would impact our system's Capital Improvement Project schedule and electrical service rates. The schedule has been established to upgrade the system to accommodate increasing load and to replace old equipment. To delay other projects so we could accelerate the replacement of the PCB capacitors would affect the system's reliability and our ability to meet new load requirements. We have already delayed important projects because of economic and personnel requirements; to accelerate the PCB replacement program would add to these delays.

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Therefore, considering the circumstances of the location of the capacitors, their age, inspection, the system's increasing load and necessary upgrade program, we recommend that the present schedule be maintained for the replacement of PCB capacitors. This would be in the best interest of the public and City Light rate payers.

Very truly yours,

J. P. Recchi

Joseph P. Recchi
Superintendent

JCN:ktw

bcc: Recchi
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Sickler
Fletcher, K.
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